

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: GLUCAGON-LIKE PEPTIDE-1
RECEPTOR AGONISTS (GLP-1 RAs)
PRODUCTS LIABILITY LITIGATION**

CIVIL ACTION

THIS DOCUMENT RELATES TO:

MDL No. 3094

ALL ACTIONS / ALL CASES

2:24-md-03094-KSM

DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' MASTER COMPLAINT

Pursuant to Federal Rules of Civil Procedure 12(b)(6) and 12(f) and Local Rule 7.1, Defendants Novo Nordisk A/S, Novo Nordisk Inc., and Eli Lilly and Company file this Motion to Dismiss Plaintiffs' Master Complaint for failure to state a claim upon which relief can be granted and to strike redundant, immaterial, and impertinent matter contained in the Master Complaint. For the reasons stated in the memorandum supporting this motion, the Court should dismiss Counts III to XIV and Plaintiffs' demand for medical monitoring damages, and the Court should strike the language in the Preliminary Statement that threatens to inject inefficiency into this proceeding and undermine the Court's authority.

Dated: January 24, 2025

Respectfully submitted,

/s/ Samuel W. Silver

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CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2025, a true and correct copy of the foregoing Defendants' Motion to Dismiss Plaintiffs' Master Complaint was electronically filed using the Court's CM/ECF System, which will send notification of such filing to all counsel of record.

/s/ Loren H. Brown

Loren H. Brown